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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH

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In re:  Hall Labs, LLC,  Debtor.	Bankruptcy No. 25-21038  Chapter 11  Honorable Joel T. Marker
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DECLARATION OF THOMAS ALDRIDGE IN SUPPORT OF STAG INDUSTRIAL HOLDINGS, LLC'S MOTION FOR COMFORT ORDER REGARDING SCOPE OF AUTOMATIC STAY

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I, Thomas M. Alldridge, hereby declare as follows.

1. I am over 18 years of age and am competent to testify with regards to the matters contained herein.
2. I am an attorney with the law firm Holland & Hart LLP, am duly licensed to practice in the State of Utah and am a member in good standing of the Utah State Bar. Holland & Hart is counsel of record for Plaintiff STAG Industrial Holdings, LLC ("STAG") in the matter captioned *STAG Industrial Holdings, LLC v. Hall Property Holdings, LLC et al.*, case no. 2:24-cv-00335-HCN-JCB (the "**Federal Case**"), pending in the United States District Court for the District of Utah, Central Division (the "**District Court**"). I have personal knowledge of all matters stated

herein, and I make this declaration in support of STAG's Motion for Comfort Order Regarding Scope of Automatic Stay (the "**Motion**"), filed concurrently.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Federal Case's Docket as of April 14, 2025.

4. In the spring of 2024, Hall Property Holdings, LLC, vacated the premises it leased from STAG after failing to pay over \$1 million in rent under the Lease Agreement.

5. On May 9, 2024, Holland and Hart filed the Federal Case on behalf of STAG and against Hall Property Holdings, LLC; Hall Labs, LLC; DRH Holdings, LLC; and David R. Hall (collectively, "**Defendants**").

6. On May 20, 2024, STAG terminated the Lease Agreement due to Hall Property's failure to perform its obligations under the same.

7. On June 3, 2024, STAG filed in the Federal Case an Amended Complaint, a copy of which is attached as **Exhibit B**.

8. On July 3, 2024, Defendants filed an Answer to Amended Complaint and Counterclaims (the "**Answer**"), a copy of which is attached as **Exhibit C**.

9. On April 3, 2025, STAG filed in the Federal Case a Motion for Partial Summary Judgment ("**STAG's MPSJ**") seeking "only a determination from the Court on the issue of alibility" under "STAG's Breach of Guaranty Claim and [Mr.] Hall's Breach of the Duty to Mitigate Counterclaim."

10. A copy of STAG's MPSJ is attached as **Exhibit D**.

11. On April 7, 2025, the Defendants filed in the Federal Case a Notice "to the [District] Court[,] all Parties[,] and their Attorneys of Record," a copy of which is attached as **Exhibit E**.

12. On April 8, 2025, the District Court entered a docket order stating, “case stayed per [Defendants’] Notice of Bankruptcy.” *See* Federal Case Docket, Ex. A, at entry dated April 8, 2025.

13. I hereby declare under penalty of perjury under the laws of the United States and the State of Utah that the foregoing is true and correct.

Executed on April 14, 2025 in Salt Lake City, Utah.

/s/ *Thomas M. Alldridge*

Thomas M. Alldridge

## CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2025, I filed the foregoing electronically through the CM/ECF system, which served by electronic means the following parties or counsel and any party-in-interest having entered an appearance and requested notice, as more fully reflected on the Notice of Electronic Filing:

Diaz & Larsen  
Attn: Andres Diaz, [courtmail@adexpresslaw.com](mailto:courtmail@adexpresslaw.com)  
Counsel for the Debtor

Melinda Willden, [matthew.burne@usdoj.gov](mailto:matthew.burne@usdoj.gov)  
[USTPRegion19.SK.ECF@usdoj.gov](mailto:USTPRegion19.SK.ECF@usdoj.gov)  
US Trustee Office

I further certify that on April 14, 2025, a copy of the foregoing was served on the following First-Class Mail, U.S. postage prepaid, which include the Debtor, the Nondebtor Defendants in the Federal Case, and the largest 20 unsecured creditors:

1. Hall Labs, LLC, PO Box 51440, Provo, UT 84605
2. Hall Property Holdings, LLC, c/o Brammer Ranck LLP, Attn. J. Brady Brammer, 1955 West Grove Parkway Suite 200, Pleasant Grove, Utah 84062
3. Hall Property Holdings, LLC, c/o Scott Robert Dansie, 11726 South Canberra Drive, Sandy Utah 84094
4. DRH Holdings, LLC, c/o Brammer Ranck LLP, Attn. J. Brady Brammer, 1955 West Grove Parkway Suite 200, Pleasant Grove, Utah 84062
5. DRH Holdings, LLC, c/o Scott Robert Dansie, 11726 South Canberra Drive, Sandy Utah 84094
6. David R. Hall, c/o Brammer Ranck LLP, Attn. J. Brady Brammer, 1955 West Grove Parkway Suite 200, Pleasant Grove, Utah 84062
7. David R. Hall, c/o Scott Robert Dansie, 11726 South Canberra Drive, Sandy Utah 84094
8. The Parties Identified in the attached Master Service List, created pursuant to the Court's Order Granting Motion to Limit Notice and Establish Notice Procedures, Dkt. 28.

*/s/ Engels J. Tejeda*  
Engels J. Tejeda

**EXHIBIT A MASTER SERVICE LIST**

Ariel Bouskila Berkovitch & Bouskila, PLLC  
1545 US 202, Ste. 240  
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Bank of Utah  
2605 Washington Blvd.  
Ogden, UT 84401

Bello Monte  
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Roy, UT 84067

Carl Belliston  
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Provo, UT 84604

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c/o J Scott Brown  
Cohne Kinghorse, P.C.  
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Salt Lake City, UT 84111

Chris G Connelly Trust June 19 2008  
2718 E Rasmussen Drive  
Saint George, UT 84790

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580 N. Bald Mountain Drive  
Alpine, UT 84004

Evans Development, LLC  
1220 N Main Street, Suite 1  
Springville, UT 84663

Gary E Jones  
7182 N Finger Rock Place  
Tucson, AZ 85718

Gregory S. Roberts  
Ray Quinney & Nebeker PC  
36 South State Street, Suite 1400  
Salt Lake City, UT 84111

Hillcrest Bank  
215 West 2300 North  
Provo, UT 84604

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215 West 2300 North  
Provo, UT 84604

Importune, LLC  
LaVorn G. Sparks  
174 W 4750 N  
Provo, UT 84604

IRS  
Central Insolvency Operation  
PO Box 7346  
Philadelphia, PA 19101-7346

Jeffery Duncan  
3474 W Morre Road  
Tucson, AZ 85742

Keystone National Group, LLC  
And Keystone Private Income Fund  
c/o Michael Johnson and David Leigh  
36 South State Street, Suite 1400  
Salt Lake City, UT 84111

Kornerstone Guaranty Insurance Co.  
111 E Broadway, Suite 900  
Salt Lake City, UT 84111

Leaf Capital Group, LLC  
2005 Market Street, 14th Floor  
Philadelphia, PA 19103

Marbek Enterprises  
Mark R. Alder  
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Michael Hall  
737 E 2620 N  
Provo, UT 84604

Newco Capital Group, LLC  
1545 Route 202, Suite 203  
Pomona, NY 10970

R&O Investments, LC  
Steve Simmons  
933 Wall Ave.  
Ogden, UT 84404

Scott and Debbie Purdie Fam. Rev. Trust  
Debbie Purdie  
2956 North 63rd Street  
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STAG Industrial, Inc.  
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Utah State Tax Commission  
Attn: Michelle Riggs  
210 North 1950 West  
Salt Lake City, UT 84134

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30350 Peachtree Road NW, Suite 240  
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W. Fred and Jane Mensel  
3381 S Oakwood Street  
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Wells Fargo Equipment Finance  
PO Box 858178  
Minneapolis, MN 55485

Wendy Coplen  
386 E 1410 S  
Orem, UT 84058

Hall Labs, LLC  
3500 Mountain Vista Parkway  
Provo, UT 84606

Diaz & Larsen  
757 East South Temple, Suite 201  
Salt Lake City, UT 84102

United States Trustee  
Attn: Matthew Burne  
Washington Federal Bank Bldg.405 South Main Street, Ste. 300  
Salt Lake City, UT 84111

Scott Mathewson  
4505 W Sebago Way  
South Jordan, UT 84009

Kenyon Dove  
Smith Knowles, PLLC  
2225 Washington Blvd., Ste. 200  
Ogden, UT 84401

US Small Business Administration  
Attn: John Gygi  
125 South State Street Room2227  
Salt Lake City, UT 84138